

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

DE-ANNEXATION OF TERRITORY OF THE)
OLDHAM COUNTY WATER DISTRICT TO THE) CASE NO.
CITY OF LAGRANGE) 2007-00193

COMMISSION STAFF'S FIRST DATA REQUEST
TO OLDHAM COUNTY WATER DISTRICT

Oldham County Water District ("Oldham District"), pursuant to 807 KAR 5:001, is to file with the Commission the original and 8 copies of the following information, with a copy to all parties of record. The information requested herein is due within 15 days of the date of this request. Each copy of the data requested should be placed in a bound volume with each item tabbed. When a number of sheets are required for an item, each sheet should be appropriately indexed, for example, Item 1(a), Sheet 2 of 6. Include with each response the name of the person who will be responsible for responding to questions relating to the information provided. Careful attention should be given to copied material to ensure that it is legible.

Each response shall be under oath or, for representatives of a public or private corporation, a partnership, an association or a governmental agency, be accompanied by a signed certification of the preparer or person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Oldham District shall make timely amendment to any prior response if it obtains information upon the basis of which it knows that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which Oldham District fails to furnish all or part of the requested information, Oldham District shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be provided for total company operations and jurisdictional operations, separately.

1. Provide a copy (and file the original) of the "Petition to de-annex" that is referenced in the letter from Phillip Ward, Superintendent of Oldham District, to Beth O'Donnell, Executive Director of the Commission, dated May 9, 2007.

2. State whether the Oldham County Fiscal Court ("Fiscal Court") still supports the de-annexation, given that the minutes included in the application are from March 15, 2005, over 2 years ago.

3. State whether the LaGrange City Council ("City Council") still supports the de-annexation by Oldham District, given that its Resolution No. 3-2005 was entered on March 7, 2005, over 2 years ago.

4. State whether the position of the LaGrange Utilities Commission ("LaGrange"), as stated in the letter from Russell D. Rose, Director, to Phillip Ward dated August 13, 2002, is still the position of LaGrange.

5. State whether the cost and water comparison of LaGrange and Oldham District, dated from December 31, 2003 to November 30, 2004, is still accurate.

6. Provide a copy of the notice(s) of the de-annexation hearing that the Oldham County Judge/Executive conducted.

7. Identify the newspaper in which notice was published and the dates of publication.

8. Provide the current rates that LaGrange will charge for water service to the persons in the area to be de-annexed.

9. List and describe all objections to and complaints and comments regarding the proposed de-annexation that Oldham District has received from the persons residing in the proposed de-annexed area.

10. Describe the changes to Oldham District's distribution system that must occur for the proposed transfer of customers to LaGrange.

11. Through the proposed de-annexation, Oldham District will be relinquishing approximately 300 customers to LaGrange.

a. Describe all of the water facilities owned by Oldham District that are dedicated to provide water service to these 300 customers.

b. As a result of the de-annexation, will ownership of the assets identified in Item 11(a) be transferred from Oldham District to LaGrange?

c. How were the assets identified in Item 11(a) originally financed by Oldham District?

d. Is there any outstanding indebtedness owed by Oldham District related to the assets identified in Item 11(a)? If yes, state the amount currently outstanding, rate of interest, and annual principal retirements until fully retired.

e. Will the obligations identified in Item 11(d) be transferred to LaGrange along with the related assets?

f. Provide all correspondence regarding the transfer of the assets resulting from the de-annexation between Oldham District and the holder(s) of any debt obligations identified in Item 11(d).

g. State the anticipated loss in annual revenues resulting from the transfer of the approximate 300 customers.

13. In Oldham District's May 9, 2007 letter to the Public Service Commission, reference is made to GRW Engineers, Inc.'s February 9, 2005 letter on revenue projections. With regard to those projections, respond to the following:

a. State the basis for the projected ultimate number of customers at the Oldham County Economic Development Authority, Inc. ("OCEDA") campus.

b. For each customer classification, state the basis for the projected daily usage.

14. Does Oldham District currently possess the treatment and hydraulic capacity to serve the OCEDA campus if fully developed?

15. a. Identify all facility improvements anticipated by Oldham District to serve the OCEDA campus.

b. State the estimated construction costs of each improvement identified in Item 15(a).

c. State how Oldham District will finance the construction costs identified in Item 15(b).



Beth O'Donnell
Executive Director
Public Service Commission
P. O. Box 615
Frankfort, KY 40602

DATED June 19, 2007

cc: Parties of Record